

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PAULETTE BRANDON,)	
)	
Plaintiff,)	
)	
vs.)	No. 21 CV 4408
)	
METHODIST HOSPITALS, INC.,)	
)	Jury Demand
Defendant.)	

**AS AND FOR A FIRST COUNT OF ACTION
(Title VII RELIGIOUS DISCRIMINATION-HOSTILE ENVIRONMENT)
Nature of the Action**

1. **PAULETTE BRANDON**, (“**BRANDON**”) after leave of court, brings this action under Title VII of the Civil Rights Act of 1964 and as amended by inter alia, the Civil Rights Act of 1991, 42 U.S.C.A. §§ 2000e et seq., (“**ACT**”), venue jurisdiction under 28 U.S.C.A. § 1343 (4) and 42 U.S.C.A. § 2000e-5(f), for **METHODIST HOSPITALS, INC.**, (“**MH**”) having subjected **BRANDON** to religious discrimination by failure to treat her the same as non-Baptist employees and a hostile environment despite her complaints about same.

PARTIES

2. **BRANDON**, is an adult of Asian descent working in a religiously diverse office and a resident of Cook County, State of Illinois.

3. **BRANDON** was an employee of **MH** working as an Accounting Specialist from February 28, 2009, until **BRANDON** was terminated due to her refusal to take a vaccine due to her religious holding on December 27, 2018

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4. At all times relevant, MH is a not-for profit hospital providing services to the general public and is doing business in Indiana and Illinois.

5. MH is an employer within the meaning of the Civil Rights Act and 42 U.S.C. 2000(e) *et seq.*, and has been at all times material to the allegations herein.

FACTUAL BASIS

6. While employed at MH, BRANDON meet the work expectations of her employer by receiving average evaluations.

7. During BRANDON's employment, BRANDON was subjected to discrimination and denied an accommodation based on her religion with MH.

8. BRANDON's complaints in the work place about her hostile working conditions due to her religion, made by management employees of MH, which unreasonably interfered with the terms and conditions of BRANDON's employment and BRANDON's performance in her job, went unassisted by her supervisor, in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. Section 2000-c *et seq*; as amended by inter alia the Civil Rights Act of 1991.

9. Defendant by its action or lack of actions of its agents caused and created a hostile work environment which unreasonably interfered with BRANDON terms and conditions of employment, in violation of Title VII of the Civil Rights Act of 1964, 42 U.S.C. Section 2000(e) *et seq*; as amended by inter alia the Civil Rights Act of 1991

10. By reason of the religious discrimination and allowance of a hostile environment by the Defendant, BRANDON has suffered loss of benefits, in addition to suffering great pain, humiliation and mental anguish, all to his damage.

12. Further, said action and lack of action on the part of the Defendant was done with

malice and reckless disregard for BRANDON's protected rights.

13. Plaintiff filed a discrimination charge against Defendant with the Equal Employment Opportunity Commission (EEOC). That charge was timely filed by BRANDON against MH. (See Exhibit "A")

14. On May 20, 2021, Plaintiff was sent a notice from the MH of his right to bring this action (see Exhibit "B"), and Plaintiff timely filed this action.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff prays that the court order such relief as is necessary to make the Plaintiff whole, including:

1. Reinstatement or, alternatively, front pay;
2. Damages, including loss of pay and benefits;
3. Statutory liquidated damages due to the defendant's willful conduct;
4. Attorneys' fees and costs incurred in this action
5. Such other relief as is just and equitable.
6. The plaintiff requests a jury trial of this action.

PAULETTE. BRANDON

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